Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116

OPPOSITION OF
SPRINT CORPORATION

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Summary

The Commission's *First Report and Order* in this proceeding is a reasonable mandate which carefully balances the needs and concerns of both incumbent and competitive local service providers. Petitions to allow use of Query on Release ("QoR"), to abandon the principles adopted by the Commission for recovery of the costs of interim local number portability, and to change the schedule for deploying permanent local number portability, should all be denied. However, Sprint does agree that a waiver of the implementation schedule might be warranted for offices within the top 100 MSAs for which an ILEC has not received a *bona fide* request for portability, or where circumstances beyond the carrier's control (such as unavailability of switch software) prevent compliance with the schedule.

Use of QoR, as advocated by 6 of the RBOCs and GTE, discriminates against CLECs since only calls to ported numbers and to NXXs assigned to carriers other than the ILEC are subject to the delay and expense of a database dip. Petitioners have also failed to provide adequate documentation of the purported cost savings associated with use of QoR, of their estimates of incremental post-dial delay, or of their claim that such post-dial delay will be imperceptible to end users. Thus, reconsideration of the prohibition against use of QoR is unwarranted.

Several ILECs have also challenged the Commission's principles for recovery of interim local number portability costs. However, petitioners have offered no evidence that they will be

unable to recover the costs of providing interim local number portability to their competitors under any of the allowable cost recovery mechanisms, and are incorrect in asserting that the Commission has no jurisdiction over the recovery of these costs. The alternative cost recovery mechanisms proposed by these petitioners are anticompetitive and unlikely to result in reasonable agreements.

Finally, several parties urged that the deployment schedule for permanent local number portability be changed, either accelerated or slowed. While Sprint favors deployment of permanent local number portability capability in as many markets as soon as possible, it recognizes the resource constraints facing carriers who must comply with this schedule. On the other hand, because permanent local number portability is critical to the development of competition in the local services market, requests to slow down its deployment should be denied unless and until the Commission finds that a delay is warranted. No such finding is justified at the present time. Therefore, the Commission should deny the petitions for reconsideration of its deployment schedule.

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OPPOSITION

Sprint Corporation, on behalf of Sprint Communications Company, L.P., and the Sprint Local Telephone Companies, hereby respectfully submits its opposition to several petitions for reconsideration of the Commission's July 2, 1996 *First Report and Order* (FCC 96-286) in the above-captioned docket.

In their petitions, several incumbent LECs ("ILECs") have requested reconsideration of the prohibition on the use of "Query on Release" ("QoR"), and of the cost recovery principles for interim local number portability. Other parties have requested that the deployment schedule for implementation of permanent local number portability capability be changed, either accelerated or slowed, depending upon the petitioning party. As discussed below, these petitions should be denied. The Commission's local number portability Order is a reasonable mandate which carefully balances the needs and concerns of both incumbent and competitive local service providers. The changes requested by petitioners will upset this balance to the detriment of competition and the public interest.

I. QUERY ON RELEASE IS DISCRIMINATORY AND SHOULD NOT BE ALLOWED.

With the exception of Ameritech, all of the BOCs, as well as GTE and USTA, have requested that carriers be allowed to use QoR within their own networks to handle calls to NXXs assigned to them. Under QoR, the carrier sends a SS7 message to the switch to which the NXX was originally assigned. If the called number has been ported and is no longer resident in the ILEC's switch, the ILEC will then do a database query to determine where the call should be terminated. These ILECs assert that because QoR avoids "billions" of unnecessary database queries, it will allow ILECs to avoid millions of dollars in infrastructure investment and will be more reliable than location routing number (LRN)[1] routing because it does not place as great a strain on their networks. They estimate that the difference in post-dial delay for calls routed using LRN as compared to QoR is between .5 and 1 second, an amount "imperceptible" to the calling party.

Requests to allow QoR should be rejected. QoR discriminates against CLECs since, as USTA has admitted (p. 8), "[o]nly the calls that require database dips for their completion [*i.e.*, calls to ported numbers or to numbers in non-ILEC NXXs] experience the delay and expense of the dip." Subjecting competitors' traffic to greater delay and greater expense than the ILECs' own traffic experiences will obviously make it more difficult for the CLEC to compete against the ILEC. QoR is

[1] Under LRN, a database query is performed on every interswitch call attempt to a ported NXX.

especially harmful to facilities-based local service competition since completion of calls to a facilities-based CLEC will always require a database look-up.[2] Since genuine, viable competition will come about only if there are facilities-based alternatives to the ILECs, QoR is obviously contrary to the public interest. QoR may be a good system for a monopolist or a near-monopolist; however, if, as is to be hoped, competition in the local market takes root and grows rapidly, QoR must certainly be considered harmful to competition and the public interest.

Given the discriminatory aspects of QoR, and its anti-competitive impact, the Commission should reject BellSouth's suggestion (p. 21) that QoR be allowed "until it can be demonstrated that such implementation actually produces an anticompetitive result or violates any of the Commission's performance criteria." Once an anticompetitive result has been produced, it is difficult, and perhaps impossible, to undo the harm inflicted. It is far better to avoid an anticompetitive result in the first place, than to attempt to fix it after the fact.

Requests to implement QoR also should be rejected because the petitioners have failed to provide adequate documentation of the purported benefits of QoR. For example, several ILECs claimed multi-million dollar savings if they are allowed to

[2] CLECs which resell the local service offerings of the ILEC will have numbers in the ILEC's NXX series. Because these numbers are already assigned to the ILEC's switch, no database look-up would be required.

deploy QoR rather than LRN.[3] However, none of them has provided sufficient information about the assumptions underlying its calculations. As the Commission recognized in its Order (¶54), alleged savings associated with QoR are sensitive to factors such as the percentage of calls terminating to ported numbers. Except for Nynex (which assumed 30% porting of customers), none of the petitioning ILECs even alluded to the porting percentage it had assumed during the time period analyzed.[4]

The petitioning ILECs also have failed to document either their estimates of post-dial delay, or their assertion that such delays will be imperceptible. No evidence has been provided as to callers' sensitivity to dialing delays on local calls. It could well be that end users expect faster call completion for local calls than for toll free or long distance calls, and will notice even small differences in post-dialing delay on local calls. And, it is likely that callers who do perceive the delay will attribute such delay to the fact that the called party has switched to a CLEC, since no delay occurs on calls to subscribers of the ILEC. Thus, while it is true that it is the ILEC's customer (the calling party) who experiences the dialing delay,

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[3] *See, e.g.*, Bell Atlantic, p. 5 ($180 million); BellSouth, p. 23 ($50 million over the first 5 years); Nynex, p. 5 ($25 million over 5 years); Pacific, p. 9 ($130 million over 5 years); SWB, p. 2 ($72 million in the top 100 MSAs).

[4] QoR is apparently more cost-effective the lower the percentage of calls to ported numbers. Since longer set-up times and greater expense will hamper CLECs' ability to compete, QoR will seem more attractive, for a longer period of time, than would be the case if all local service providers were subject to the same set-up times and database query costs.

it is the CLEC's reputation which suffers. This type of negative customer perception is especially pernicious in the initial stages of local competition, when impressions about the quality of service being provided by the new entrant are first being formed.

Even if the additional post-dial delay is imperceptible to the caller, QoR could still be harmful to competitors. For example, there is nothing to stop the ILEC from advertising or otherwise marketing the fact that calls terminating on its network are completed more quickly than calls terminating on the network of its competitors. In addition, QoR could result in dropped calls if total delay exceeds a certain threshold. For example, an operator-assisted call with caller id to a ported number might require multiple database look-ups: to the local number portability database, and to the LIDB database for operator assistance billing information and for the customer name associated with the calling party number. The incremental time added by QoR could be the factor which causes a switch to drop the call.

In the absence of any information about key assumptions, it is impossible to assess the purported benefits of QoR. Reconsideration of the prohibition of QoR under these circumstances is unwarranted.

II. THE INTERIM LOCAL NUMBER PORTABILITY COST RECOVERY PRINCIPLES SHOULD BE RETAINED.

In the local number portability Order, the Commission adopted two principles to govern recovery of the costs of

providing interim local number portability: the cost recovery mechanism should not give one service provider an appreciable, incremental cost advantage over another service provider when competing for a specific subscriber (¶132); and it should not have a disparate effect on the ability of competing service providers to earn normal returns on their investment (¶135). Several ILECs have requested that the Commission reconsider these principles, arguing that their application will prevent ILECs from recovering their costs, in violation of the fifth and fourteenth Amendments,[5] and that recovery of interim local number portability costs falls under the jurisdiction of the states rather than the FCC.[6]

Petitioners have offered no evidence that they will be unable to recover the costs of providing interim local number portability to competitors, and have misread that portion of the Telecommunications Act of 1996 which gives the Commission authority over local number portability rates. Moreover, the alternative cost recovery mechanisms they have suggested will do little to foster competition in the local services market. Therefore, petitioners' requests here should be denied, and the interim cost recovery principles adopted by the Commission should be retained.

The petitioning ILECs complain bitterly that they will be unable to recover the costs of providing Direct Inward Dialing

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[5] *See, e.g.*, BellSouth, p. 2; Cincinnati Bell, p. 1; GTE, p. 11.

[6] *See, e.g.*, Bell Atlantic, p. 11; BellSouth, p. 3; SBC, p. 3.

("DID") or Remote Call Forwarding ("RCF") to their competitors, citing ¶133 of the Order, which states that "the incremental payment by the new entrant if it wins a customer would have to be close to zero, to approximate the incremental number portability cost borne by the incumbent LEC if it retains the customer" (footnote omitted). However, these ILECs have offered no evidence to support their claim of confiscation.

First, the ILECs have provided no information as to the costs they will incur to provide DID or RCF to competitors. If these incremental costs are in fact close to zero, a low interim local number portability rate would be sufficient to recompense the ILEC. It may be that the ILECs are dissatisfied with a low interim rate to competitors because they have been allowed to assess higher (and not necessarily cost-based) retail rates for DID and RCF on their end user subscribers. However, as the record demonstrates,[7] RCF when used as an interim portability solution differs from RCF as used by end users. Thus, it is inappropriate for the ILEC to charge the CLEC the retail rate charged to end users for RCF.

Second, the paragraph cited by the ILECs is simply "an example [to] illustrate[] the application of" the Commission's first cost recovery criterion. The following paragraph (134) provides another example of a cost recovery mechanism which would also satisfy the Commission's criterion, namely, a uniform assessment on the revenues of all telecommunications carriers,

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[7] *See, e.g.*, Sprint's Comments filed September 12, 1995, n. 16, in this docket.

less any charges paid to other carriers. It is possible that still other cost recovery mechanisms could be implemented which also satisfy the Commission's principle while allowing the ILEC to recover its reasonable costs of providing DID or RCF to competitors. None of the petitioning ILECs has demonstrated that any of these other cost recovery mechanisms would be non-compensatory.

The parties opposing the Commission's principles for interim local number portability cost recovery instead assert that the Commission should leave this matter to the states or to individual carrier-to-carrier negotiations.[a] In addition, GTE recommended that the costs associated with providing DID and RCF be pooled, allocated among carriers based on call volumes, and recovered through end user surcharges. Each of these proposals should be rejected.

With passage of the Telecommunications Act of 1996, the former state/federal jurisdictional split was replaced with a new system under which state and federal regulators share responsibility for different aspects of telecommunications services. Section 251(e)(2) explicitly gives the Commission authority to determine a competitively neutral method for recovering the costs of number portability; thus, there would seem to be no doubt about the Commission's jurisdiction over interim local number portability rates. To the extent that existing state regulations over interim local number portability

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[a] *See, e.g.*, Bell Atlantic, p. 11; BellSouth, p. 3; Cincinnati Bell, p. 1; SBC, p. 3.

cost recovery are competitively neutral and satisfy the Commission's cost recovery principles, it would seem reasonable to retain such state regulations. However, recovery mechanisms which do not satisfy the Commission's principles must be revised to bring them into compliance with such principles.

As the Commission found in its Order (¶103), RCF and DID have several limitations which render them inadequate as long-term local number portability measures. However, BellSouth's insistence in its petition for reconsideration (p. 4) that DID and RCF are not subject to Section 251(e)(2) because they are "transitional measures" rather than local number portability, is without merit. Both DID and RCF allow calls to be delivered, albeit crudely and inefficiently, to an end user who has chosen a new local service provider, when the caller has dialed the end user's original telephone number. There is no denying that RCF and DID are transitional measures; however, what is significant is that they are transitional number portability measures. This view is consistent with BellSouth's previously expressed characterization of DID and RCF. For example, in its September 13, 1995 comments in this docket, BellSouth stated that the Commission should "encourage the state commissions to implement remote call forwarding ('RCF'), flexible direct inward dialing ('DID'), or variants of these approaches as *interim service provider number portability solutions* in order to facilitate competition in the local exchange market" (p. 46, emphasis added). BellSouth also presented its plan for recovering the

costs of these two "interim number portability" measures in those comments (pp. 56-57). BellSouth's about-face here is nothing more than an excuse to avoid compliance with the Commission's cost recovery principles.

At least one RBOC, SBC, has recommended (p. 3) that interim local number portability cost recovery be left to carrier-to-carrier negotiations. This approach should be rejected. Incumbent LECs have little economic incentive to negotiate with their would-be competitors. The "inequality of bargaining power between incumbents and new entrants militates in favor of rules that have the effect of equalizing bargaining power...."[9] Thus, the Commission should retain its cost recovery principles and require all ILECs to develop interim local number portability rates which comply with such principles.

Finally, as noted above, GTE has recommended that interim local number portability costs be pooled, allocated among carriers, and recovered through end user surcharges. This recommendation should be rejected. Pools involve cross-subsidies of less efficient service providers. Moreover, GTE's plan is administratively costly and cumbersome. Since interim local number portability costs are expected to be relatively low, it makes no sense to establish a complicated system for their allocation and recovery.

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[9] *See Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, *First Report and Order* released August 8, 1996, FCC 96-325, ¶55.

III. THE SCHEDULE FOR IMPLEMENTING PERMANENT LOCAL NUMBER PORTABILITY SHOULD BE MAINTAINED AT THE PRESENT TIME.

Several parties, on opposite sides of the issue, have petitioned for reconsideration of the Commission's schedule for deploying permanent local number portability capability. On the one hand, three CLECs have suggested that the deployment schedule be accelerated, and that parties be allowed to submit *bona fide* requests for permanent local number portability capability in MSAs below the top 100 before January 1, 1999.[10] On the other hand, several ILECs have requested additional time to implement permanent local number portability capability.[11] Sprint agrees that ILECs should be allowed to request a waiver of the implementation schedule for offices in the top 100 MSAs for which they have not received a *bona fide* request for portability. However, the other requests to modify the portability deployment schedule should be denied.

While Sprint favors deployment of permanent local number portability capability in as many markets as soon as possible, it is aware of the magnitude of the undertaking required to meet the

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[10] *See* ACSI, p. 10 (July 1, 1998); KMC, p. 2 (January 31, 1997); Nextlink, p. 2 (proposing that procedures be adopted under which additional MSAs can be added to the initial deployment schedule or otherwise expedited).

[11] *See, e.g.*, GTE, p. 5; BellSouth, p. 11 (extend implementation interval from 90 to 180 days); SBC, p. 10; US West, p. 15 (delay implementation schedule until cost recovery issues are resolved); NTCA/OPASTCO, p. 2 (rural LECs not required to provide permanent local number portability until they have received a specific request for it); USTA, p. 14. Several parties have also requested reconsideration of the implementation deadlines applicable to CMRS providers (*see, e.g.*, Bell Atlantic/Nynex Mobile, p. 1; CTIA, p. 2; GTE, p. 21). Sprint takes no position on the petitions of CMRS providers.

Commission's deployment schedule. Carriers (in particular, incumbent LECs) have a major task ahead of them, and accelerating the pace of deployment in the markets below the top 100 MSAs would divert necessary resources away from the largest markets. While Sprint is aware that not all CLECs will be targeting the top 100 MSAs for their initial marketing efforts (ACSI, p. 8), it is reasonable to assume, as the Commission has, that the most intense competitive activity will occur in the largest markets. Since permanent local number portability capability cannot be introduced everywhere at once, the public interest will be best served by first deploying such capability in those markets which are most likely to have a CLEC presence.

On the other hand, several ILECs have requested that the local number portability deployment schedule be slowed down. US West, for example, suggested (p. 16) that "the Commission must put in place a mechanism for full cost recovery before it requires any carrier...to begin spending the enormous amounts necessary to implement number portability." Because permanent local number portability is critical to the development of competition in the local services market, its implementation should not be delayed without a specific determination by the Commission that such a delay is warranted. At present, there is no basis for such a determination. The Commission has over a year to resolve cost recovery issues before the first markets are scheduled to have local number portability capability, and there would appear to be no reason why cost recovery decisions cannot

be made within that time, especially since the pleading cycle on this issue is now closed. Moreover, there is nothing to suggest that whatever cost recovery mechanism is adopted by the Commission will prevent carriers from recovering the reasonable costs of implementing local number portability which were incurred prior to adoption of such mechanism.

Several ILECs have suggested that not every switch in a MSA need be equipped with local number portability capability in order for the carrier to be in compliance with the Commission's deployment schedule, and that some switches owned by very small, rural LECs should be exempt from the deployment schedule.[12] Such proposals are not unreasonable. There may be some small offices within an MSA which serve only a very small number of end users and which do not have a CLEC presence. Recognizing the limited resources available to carriers to deploy local number portability, and the benefits of maximizing "the bang for the buck," Sprint agrees that an ILEC should be allowed to request a waiver of the implementation schedule for those offices for which it has not received a *bona fide* request for portability. However, once a *bona fide* request is received, the carrier must deploy local number portability capability within a specified timeframe to be determined by the Commission, absent some other extenuating (and fully documented) circumstances.

Sprint also does not oppose petitioners' request that waivers of the deployment schedule be granted if special

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[12] *See, e.g.*, BellSouth, p. 14; GTE, p. 9; NECA, p. 3; NCTA/OPASTCO, p. 2; John Staurulakis, Inc., p. 3; USTA, p. 15.

circumstances so warrant. For example, GTE has requested that the Commission clarify that a waiver might be granted if an ILEC experiences delays beyond its control, such as unavailability of switch software (p. 3); *see also*, Nynex, p. 8. However, carriers always have the right to request a waiver, and no further Commission clarification or reconsideration of its local number portability Order is necessary to preserve this right.

IV. CONCLUSION.

For the reasons cited above, the Commission should reject the petitions to allow QoR; retain its interim local number portability cost recovery principles; and, except for offices in the top 100 MSAs where no *bona fide* request for portability has been received, should retain its schedule for implementing permanent local number portability.

Respectfully submitted,

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September 27, 1996

CERTIFICATE OF SERVICE

I, Joan A. Hesler, hereby certify that on this 27th day of September, 1996, a true copy of the foregoing **Opposition of Sprint Corporation**, was served first class mail, postage prepaid, or hand delivered, upon each of the parties listed below.

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